

February 14, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

On behalf of Advance 2000's Government Systems Division, I am writing in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

As the Commission knows, LightSquared will operate its planned 4G LTE wireless on a wholesale basis. This approach will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve consumers. For example, Advance 2000 is currently offering a range of new cloud computing and communication services that will heavily rely on the presence of cost competitive, whole sale priced 4G LTE wireless services. In many areas of the country there are very limited options in wireless service providers and even fewer opportunities for wholesale services to value added service providers such as Advance 2000. Bandwidth will enable a wide range of new features and services to the market and we see the incumbency of existing carriers as a significant constraint on the development of free market innovation.

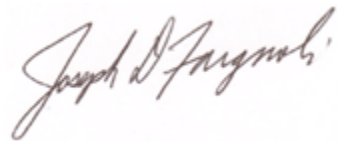
More specifically, this wholesale-only model will allow LightSquared's partners to overcome the high barriers to market entry—including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity—that could otherwise unduly raise their operating costs, or preclude them from operating altogether. Large carriers constraining competition in the market is equivalent to Microsoft's Internet Explorer limiting a consumer's ability to freely use the wide range of web services that are available. We feel that large carriers also see the evolving mobile market and Lightsquared's wholesale model enables competition provided by companies such as ours. The partnership that we are developing with Lightsquared will yield significant benefit to the consumer and a range of new innovations that will not be constrained by mega-corporation and allow grass roots innovation to thrive. By affirming LightSquared's rights as described in the Petition, the Commission would facilitate our ability to deliver the tangible benefits of more robust competition to consumers in the form of higher quality service, lower rates, and expanded voice and broadband service options.

At the same time, granting LightSquared's Petition would reinforce the integrity of the Commission's rules, and provide the regulatory certainty necessary for companies like Advance 2000 and LightSquared to attract investment and continue developing innovative

communications solutions that truly benefit consumers. It bears emphasis that LightSquared's Petition does *not* ask the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, the Petition merely asks the Commission to affirm its *existing* legal and policy framework for spectrum licensing and usage rights, which (i) has been in place for decades; (ii) formed the basis for the technical standards developed cooperatively by LightSquared and the commercial GPS industry almost a decade ago; and (iii) has been relied upon by LightSquared and its investors, customers, and others throughout the implementation of the LightSquared network.

Hundreds of millions of American consumers would benefit from the greater competition that would be made possible by LightSquared's network—consistent with the objectives of the *National Broadband Plan*. Accordingly, I urge the Commission to grant LightSquared's Petition on an expedited basis.

Respectfully submitted,

A handwritten signature in dark ink, reading "Joseph D. Fagnoli". The signature is written in a cursive, flowing style.

Joseph D. Fagnoli
President Government Division
Advance 2000, Inc.